

BENJAMIN SOUEDE, OSB No. 081775

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Attorneys for Defendant Blancey Lee

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:14-CR-00184(2)-JO

Plaintiff,

vs.

BLANCEY LEE,

Defendant.

**DECLARATION OF BENJAMIN
SOUEDE N SUPPORT OF
DEFENDANT'S UNOPPOSED
MOTION TO CONTINUE TRIAL
DATE**

I, Benjamin Souede, declare:

1. I am an attorney with the Angeli Law Group LLC; I represent Defendant Blancey Lee in the above-captioned matter.

2. Mr. Lee was arraigned on the Indictment in the above-entitled action on May 15, 2014. The Indictment charges Mr. Lee with a single count of Conspiracy to Commit Wire Fraud in violation of 18 U.S.C. § 1349, with seven counts of Engaging in Monetary Transactions in Criminally Derived Property in violation of 18 U.S.C. § 1957, and with one count of Conspiracy

to Commit Transactional Money Laundering in violation of Interstate Transportation of Stolen Property in violation of 18 U.S.C. § 1956(h).

3. Trial in this matter is currently set for July 15, 2014.

4. By this Motion, Mr. Lee respectfully moves without opposition for a continuance of the current trial date of not less than six (6) months.

5. This motion is brought for the following reasons:

- a) Defense counsel is engaged in other matters in the District of Oregon and in other districts, and requires additional time to prepare for trial in this complicated matter.
- b) The United States is continuing to produce discovery in this matter.
- c) I have conferred in good faith with Assistant United States Attorney Donna Maddux, and Ms. Maddux has stated that the United States has no objection to continuing the trial in this matter for not less than six (6) months.

6. Based upon the facts put forth above, it is respectfully submitted that, under the Speedy Trial Act, such a continuance is necessary because the failure to grant such a continuance would deny counsel for the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Accordingly, the ends of justice served by granting such a continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C § 3161(h)(7)(A) and (B).

7. I have conferred with Mr. Lee and advised Mr. Lee of this Motion and his right to a speedy trial under 18 U.S.C. § 3161 et seq. Mr. Lee consents to and agrees with the requested

continuance. Mr. Lee also understands his rights provided under the Speedy Trial Act, and he waives his rights in light of the necessity for the continuance.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct; that the statements heretofore set forth are based on my own knowledge, except where otherwise indicated, and as to those statements I believe them to be true; and that this declaration was executed on July 1, 2014 in Portland, Oregon.

By:

s/ Benjamin Souede